

CIVIL COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK

JULIA JONES,

X

Index No. 024149 CVN 2008

Plaintiff,

ENDORSED ANSWER

-against-

CBCS  
VERIZON COMMUNICATIONS, INC.,

Defendant.

X

Defendant, VERIZON NEW YORK INC., sued here incorrectly as VERIZON COMMUNICATIONS, INC. ["Verizon"], by its attorneys, LEDY-GURREN BASS & SIFF, L.L.P., as and for its Endorsed Answer to plaintiff's Endorsed Complaint, respectfully alleges as follows, upon information and belief:

1. Denies each and every allegation contained in the endorsed complaint.

AS AND FOR A FIRST AFFIRMATIVE DEFENSE

2. Plaintiff's endorsed complaint fails to state a cognizable claim upon which relief can be granted.

AS AND FOR A SECOND AFFIRMATIVE DEFENSE

3. Plaintiff has no private right of action against defendant under the Fair Credit Reporting Act.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

4. Plaintiff fails to state a cognizable claim under the Fair Credit Reporting Act.

AS AND FOR A FOURTH AFFIRMATIVE DEFENSE

5. Plaintiff cannot establish damages.

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WHEREFORE, the answering defendant, VERIZON NEW YORK INC., sued here incorrectly as VERIZON COMMUNICATIONS, INC., demands judgment dismissing the complaint of the plaintiff against defendant together with costs and disbursements.

Dated: May 5, 2008  
New York, New York

Yours, etc.

LEDY-GURREN BASS & SIFF, L.L.P.

By:

  
EDWARD J. GORMAN  
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